

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

SOLOMON CHAU, Derivatively on Behalf  
of TESLA, INC.,

Case No.: 1:22-cv-00592-LY

Plaintiff,

v.

ELON MUSK, ROBYN DENHOLM,  
KIMBAL MUSK, IRA EHRENPREIS,  
JAMES MURDOCH, LAWRENCE J.  
ELLISON, KATHLEEN WILSON-  
THOMPSON,  
HIROMICHI MIZUNO,  
ANTONIO J. GRACIAS, STEPHEN T.  
JURVETSON, BRAD W. BUSS, and  
LINDA JOHNSON RICE,

Defendants,

-and-

TESLA, INC., a Delaware Corporation,

Nominal Defendant.

**MOTION FOR ADMISSION *PRO HAC VICE***

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Drew Liming, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas *pro hac vice* to represent Defendants Elon Musk, Robyn Denholm, Kimbal Musk, Ira Ehrenpreis, James Murdoch, Lawrence J. Ellison, Kathleen Wilson-Thompson, Hiromichi Mizuno, Antonio J. Gracias, Stephen T. Jurvetson, Brad W. Buss, and Linda Johnson Rice, and Nominal Defendant Tesla, Inc. in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm Freshfields Bruckhaus Deringer US LLP, with offices at:

Mailing address: 855 Main Street  
Redwood City, California 94063

Telephone: (650) 421-8200

Facsimile: (212) 277-4001

Email: drew.liming@freshfields.com

2. Since November 30, 2015, Applicant has been and presently is a member of and in good standing with the Bar of California. Applicant's California bar license number is 305156.
3. Applicant has been admitted to practice before the following courts:

Court:	Admission date:
California Supreme Court	Nov. 30, 2015
U.S. Court of Appeals for the Ninth Circuit	June 3, 2019
U.S. Court of Appeals for the Tenth Circuit	Nov. 7, 2016
U.S. District Court for the Central District of California	Dec. 21, 2015
U.S. District Court for the Northern District of California	Dec. 10, 2015
U.S. District Court for the District of Colorado	July 1, 2016

4. Applicant is presently an active member in good standing of the courts listed above.
5. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court.
6. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses (omitting minor traffic offenses).
7. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

8. Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel:                   Gary Ewell  
   TX Bar No. 06752800

Mailing address:             111 Congress Avenue, Suite 2800  
   Austin, Texas 78701

Telephone:                   (512) 770-4030

Facsimile:                   (877) 851-6384

Email:                       gewell@ebbklaw.com

9. Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 *pro hac vice* fee in compliance with Local Court Rule AT-1(f)(2), with checks made payable to: Clerk, U.S. District Court.
10. Should the Court grant applicant's motion, Applicant shall register as a filing user within 10 days of this order, pursuant to the Administrative Policies and Procedures for Electronic Filing in Civil and Criminal Cases in the Western District of Texas.

WHEREFORE, Applicant prays that this Court enter an Order permitting the admission of Drew Liming to the Western District of Texas *pro hac vice* for this case only.

Dated: July 8, 2022

Respectfully submitted,

/s/ Drew Liming

Drew Liming  
California Bar No. 305156  
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855 Main Street  
Redwood City, California 94063  
(650) 421-8200  
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*Attorney for Defendants Elon Musk, Robyn Denholm, Kimbal Musk, Ira Ehrenpreis, James Murdoch, Lawrence J. Ellison, Kathleen Wilson-Thompson, Hiromichi Mizuno, Antonio J. Gracias, Stephen T. Jurvetson, Brad W. Buss, and Linda Johnson Rice, and Nominal Defendant Tesla, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this 8th day of July, 2022.

/s/ Drew Liming  
Drew Liming